

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENWOOD DIVISION

Jerrold A. Watson & Sons, L.L.C. d/b/a )  
Watsonia Farms, )

Plaintiff, )

-vs- )

C.H. Robinson Company d/b/a Robinson )  
Fresh, )

Defendant. )

**JOINT RULE 26(f) REPORT**

C.A. No. 8:16-cv-02833-HMH

The parties, having consulted pursuant to Rule 26(f) of the Federal Rules of Civil Procedure hereby report as follows (check one below):

\_\_\_\_\_ We agree that the schedule set forth in the Conference and Scheduling Order filed is appropriate for this case. **The parties' proposed discovery plan as required by Fed. R. Civ. P. Rule 26(f) and the information required by Local Civil Rule 26.03 will be separately filed by the parties.**

  X   We agree that the schedule set forth in the Conference and Scheduling Order filed requires modification as set forth in the proposed Consent Amended Scheduling Order which will be e-mailed to chambers as required (use format of the Court's standard scheduling order). **The information required by Local Civil Rule 26.03 will be separately filed by each party.**

\_\_\_\_\_ We are unable, after consultation, to agree on a schedule for this case. We, therefore, request a scheduling conference with the Court. **The parties' proposed discovery plan as required by 26(f) Fed. R. Civ. P., with disagreements noted, and the information required by Local Civil Rule 26.03 will be separately filed by the parties.**

**RESPONSES TO FEDERAL RULE CIVIL PROCEDURE 26(f)**

(A) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made.

**The parties have agreed to waive 26(a)(1) disclosures.**

(B) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues.

**The parties believe discovery may be needed related to the facts and circumstances surrounding this contractual dispute. Discovery will be completed in accordance with the applicable Scheduling Order. The parties do not believe discovery needs to be conducted in phases or limited to any particular issue at this time.**

(C) Any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced.

**The parties have discussed the search, capture, and production of electronically stored information, and have agreed to work through these issues at this time.**

(D) Any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order.

**The parties do not anticipate any problems related to claims of privilege or of protection as trial-preparation materials at this time.**

(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed.

**The parties do not anticipate any changes to the limitations on discovery at this time.**

(F) Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).

**The parties are not aware of any other orders the court should issue under Rule 26(c) or Rule 16(b) at this time.**

**PLAINTIFF(S)**

**DEFENDANT(S)**

s/ Daryl L. Williams

s/ Jason D. Maertens

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*Signature of Plaintiff's Counsel*

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*Signature of Defendant's Counsel*

Daryl L. Williams  
Attorney for Plaintiff

Jason D. Maertens  
Attorney for Defendant

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*Printed Name of Plaintiff's Counsel  
and Party Represented*

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*Printed Name of Defendant's Counsel  
and Party Represented*

*Dated:* September 28, 2016

*Dated:* September 28, 2016